

20 8 3/1

*Watts*  
9/11/85

<b>POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 1 - SITE INFORMATION AND ASSESSMENT</b>		<b>I. IDENTIFICATION</b> 01 STATE 02 SITE NUMBER IL 40980899298	
<b>II. SITE NAME AND LOCATION</b>			
01 SITE NAME (Legal, common, or descriptive name of site)		02 STREET ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER	
Comanche Oil Corp		NE 1/4 of Sect 11 T-7-S, R2-W	
03 CITY	04 STATE	05 ZIP CODE	06 COUNTY
Vergennes Township	IL	62701	Jackson
07 COUNTY CODE	08 CONG DIST		
07	22		
09 COORDINATES LATITUDE		LONGITUDE	
37 55 29		089 17 02	
		Vergennes 7.5' Quad (265)	
10 DIRECTIONS TO SITE (Starting from nearest public road)			
See Attached Map			
<b>III. RESPONSIBLE PARTIES</b>			
01 OWNER (if known)		02 STREET (Business, mailing, residential)	
Leland Coffey		R.R. #1	
03 CITY	04 STATE	05 ZIP CODE	06 TELEPHONE NUMBER
Vergennes	IL	62994	UNK
07 OPERATOR (if known and different from owner)		08 STREET (Business, mailing, residential)	
Comanche Oil Corporation		400 East Jefferson Street	
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER
Springfield	IL	62701	UNK
13 TYPE OF OWNERSHIP (Check one)			
<input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER: _____ (Specify) <input type="checkbox"/> G. UNKNOWN			
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)			
<input type="checkbox"/> A. RCRA 3001 DATE RECEIVED: _____ MONTH DAY YEAR <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 d) DATE RECEIVED: _____ MONTH DAY YEAR <input checked="" type="checkbox"/> C. NONE			
<b>IV. CHARACTERIZATION OF POTENTIAL HAZARD</b>			
01 ON SITE INSPECTION		BY (Check all that apply)	
<input type="checkbox"/> YES DATE _____ MONTH DAY YEAR <input checked="" type="checkbox"/> NO		<input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify)	
		CONTRACTOR NAME(S): _____	
02 SITE STATUS (Check one)		03 YEARS OF OPERATION	
<input type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input checked="" type="checkbox"/> C. UNKNOWN		BEGINNING YEAR _____ ENDING YEAR _____ UNK    UNKNOWN	
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED			
Oily Waste (Toxic) Heavy Metals (Soluble/Toxic/Persistent)			
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION			
Ground Water (Population/Environment) Surface Water (Environment)			
<b>V. PRIORITY ASSESSMENT</b>			
01 PRIORITY FOR INSPECTION (Check one if high or medium is checked, complete Part 2 Waste Information and Part 3 Description of Hazardous Conditions and Incidents)			
<input type="checkbox"/> A. HIGH (Inspection required promptly) <input checked="" type="checkbox"/> B. MEDIUM (Inspection required) <input type="checkbox"/> C. LOW (Inspect on time available basis) <input type="checkbox"/> D. NONE (No further action needed, complete current disposition form)			
<b>VI. INFORMATION AVAILABLE FROM</b>			
01 CONTACT		02 OF (Agency/Organization)	
03 TELEPHONE NUMBER			
( )			
04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION	07 TELEPHONE NUMBER
Rich Lange	IEPA	HSCS	1217782-6760
08 DATE		09 DATE	
09 10 85		09 10 85	
MONTH DAY YEAR		MONTH DAY YEAR	

EPA FORM 2070-12 (7-81)

EPA Region 5 Records Ctr.



304348

ILD 980 899 298



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER  
IL 0980899298

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A GROUNDWATER CONTAMINATION  
03 POPULATION POTENTIALLY AFFECTED 1,711.2

02 ☐ OBSERVED (DATE \_\_\_\_\_) ☒ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

Highly soluble brine waste placed for disposal in unlined lagoon. This practice has impacted private wells at similar facilities.

01 ☒ B SURFACE WATER CONTAMINATION  
03 POPULATION POTENTIALLY AFFECTED Unk

02 ☐ OBSERVED (DATE \_\_\_\_\_) ☒ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

Ground-water discharge to Surface Water / Area subject to possible flooding

01 ☐ C CONTAMINATION OF AIR  
03 POPULATION POTENTIALLY AFFECTED \_\_\_\_\_

02 ☐ OBSERVED (DATE \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

01 ☐ D FIRE/EXPLOSIVE CONDITIONS  
03 POPULATION POTENTIALLY AFFECTED \_\_\_\_\_

02 ☐ OBSERVED (DATE \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

01 ☐ E DIRECT CONTACT  
03 POPULATION POTENTIALLY AFFECTED \_\_\_\_\_

02 ☐ OBSERVED (DATE \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

01 ☒ F CONTAMINATION OF SOIL  
03 AREA POTENTIALLY AFFECTED Unk

02 ☐ OBSERVED (DATE \_\_\_\_\_) ☒ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

Loss of production (Ag land) & damage to soil structure has been noted at similar sites.

(See J following) (See 05 Other following)

01 ☒ G DRINKING WATER CONTAMINATION  
03 POPULATION POTENTIALLY AFFECTED 1,711.2

02 ☐ OBSERVED (DATE \_\_\_\_\_) ☒ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

See A above

01 ☐ H WORKER EXPOSURE/INJURY  
03 WORKERS POTENTIALLY AFFECTED \_\_\_\_\_

02 ☐ OBSERVED (DATE \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION

01 ☐ I POPULATION EXPOSURE/INJURY  
03 POPULATION POTENTIALLY AFFECTED \_\_\_\_\_

02 ☐ OBSERVED (DATE \_\_\_\_\_) ☐ POTENTIAL ☐ ALLEGED  
04 NARRATIVE DESCRIPTION



POTENTIAL HAZARDOUS WASTE SITE  
PRELIMINARY ASSESSMENT  
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

IL 980899298

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☒ J. DAMAGE TO FLORA  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE \_\_\_\_\_)

☒ POTENTIAL ☐ ALLEGED

The near sterilization of soils (>5 acres), Attributed to increased soil salinity, has been noted at other similar sites.

(See F Above) (See 05 other following)

01 ☐ K. DAMAGE TO FAUNA  
04 NARRATIVE DESCRIPTION (include names of species)

02 ☐ OBSERVED (DATE \_\_\_\_\_)

☐ POTENTIAL ☐ ALLEGED

01 ☐ L. CONTAMINATION OF FOOD CHAIN  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE \_\_\_\_\_)

☐ POTENTIAL ☐ ALLEGED

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES  
(Spills, runoff, leaking drums, leaking drums)

02 ☐ OBSERVED (DATE \_\_\_\_\_)

☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED \_\_\_\_\_

04 NARRATIVE DESCRIPTION

01 ☐ N. DAMAGE TO OFFSITE PROPERTY  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE \_\_\_\_\_)

☐ POTENTIAL ☐ ALLEGED

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE \_\_\_\_\_)

☐ POTENTIAL ☐ ALLEGED

01 ☒ P. ILLEGAL/UNAUTHORIZED DUMPING  
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE \_\_\_\_\_)

☐ POTENTIAL ☐ ALLEGED

Site was infrequently inspected by regulatory agencies, Facility has now been backfilled making illegal dumping hard to detect.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

Removal of soils by brines is deemed leading cause of soil erosion in several IL counties.

III. TOTAL POPULATION POTENTIALLY AFFECTED: 1,711.2

IV. COMMENTS

Comanche Oil Corp  
400 E. Jefferson St.  
Springfield, IL 62701

Information as appears  
on EPCIS (C-4)

V. SOURCES OF INFORMATION (Cite specific references e.g. state files, sample analysis, reports)

S.I.A. study

## EXECUTIVE SUMMARY

This site has been placed in the ERRIS data base as a result of its selection for Phase II evaluation during the federally funded Surface Impoundment Assessment (SIA) study of 1980. During ERRIS placement the operator name and business address were utilized from the SIA which results in deviations from ERRIS for actual site location, Part I section II items 02 through 08 of form 2070-12. This use of operator name and address has also led to one (1) ERRIS listing representing, in actuality, from one (1) to one hundred eight (108) actual brine pits at an equal number of separate locations.

Some considerable effort has been expended to select the site with highest, Phase II SIA, pollution potential where multiple sites are represented by a single ERRIS listing. One must keep in mind that the Phase II SIA represents no more than 7 percent of the brine pits identified in Illinois. Phase I identified more than 3200 pits where Phase II evaluated a random selection of less than 220. One must also maintain a realization that phase II pollution potential was determined by bench top study with little or no actual site visitation or monitoring.

Minimal to no file information exists on this site beyond that contained in Phases I and II of the SIA. There is no direct evidence of hazardous waste disposal at this site beyond the potentially hazardous constituents of Illinois Basin brines, but with only annual inspections by Illinois Mines and Minerals staff relevant to oil production practices and recent backfilling of most brine pits in Illinois, disposal of off site material of unknown nature is possible. A literature review and laboratory analysis of samples from two other sites indicate concern for contamination of groundwater/surface water by Sodium, Sulfate, Chloride etc. (Non-Hazardous Constituents), concern for heavy metals (i.e., Chrome, Vanadium, Barium) and long chain hydrocarbons.

A question arises as to the addressability of the heavy metals by CERCLA when one considers 40 CFR section 300.6 "Definitions - Federally Permitted Release (i)" and Section 101(10) of CERCLA. The statement "and which are reinjected" seems to allow CERCLA action, but interpretation and clarification by USEPA legal staff seems required. The long chain hydrocarbons would appear to be included in the exclusion given to crude oil and fractions thereof under 40 CFR section 300.6 "Definitions-Hazardous Substance" and 101(14) of CERCLA.

A medium priority has been assigned due to the potential impact of this site on groundwater in a rural area where private wells are generally the sole source for potable water. Similar sites have impacted private wells to a point requiring users to seek alternative sources for drinking water. A site inspection should be scheduled to verify/update owner-operator information and gain more thorough site specific information.

RML:bf/22

